

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
TEXAS FORT WORTH DIVISION**

ROBERT (BOB) ROSS,

Plaintiff/Counterclaim Defendant,

V.

ASSOCIATION OF PROFESSIONAL
FLIGHT ATTENDANTS, *et al.*,

Defendants/Counterclaim Plaintiff

卷之三

Civil Action No. 4:22-cv-343-Y

Judge Terry R. Means

(Relates to Motion Referred to
Magistrate Judge Cureton)

**APPENDIX IN SUPPORT OF THE RESPONSE OF DEFENDANT, DIVERSIFIED
IN OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL PRODUCTION OF
DOCUMENTS**

Pursuant to Local Rule 7.1(i) and Section II.C of this Court's Case Management Requirements, Defendant, McGaughey, Reber and Associates, Inc. d/b/a Diversified Credit Systems (Diversified) submits this appendix of materials cited in Response of Defendant, McGaughey, Reber and Associates, Inc. d/b/a Diversified Credit Systems (Diversified) in Opposition to Plaintiff's Motion to Compel Production of Documents.

Description	Appendix Pages
Suit Authorization	Appx. 2
Privilege Log	Appx. 3-5
Produced documents	Appx. 6-32

Diversified Credit Systems
PO Box 3424
Longview, TX 75606
(800) 256-3838

May 26, 2021

A.P.F.A.
Erik Harris
Treasurer
1004 W. Euless Blvd.
Euless, TX 76040

RE: Bob Ross
Account #: 001210129
Amount Due: \$5,436.47

*****SUIT AUTHORIZATION*****

The undersigned herewith authorizes **Diversified Credit Systems**, as our agent, to retain an attorney for A.P.F.A. under a retainer agreement consistent with the terms of this authorization.

Council is hereby authorized to institute legal action against Bob Ross for the collection of an open account in the principal sum of \$5,436.47 and to conduct all necessary arrangements and correspondence with **Diversified Credit Systems**.

Suit shall be commenced in our name only and the attorney shall be regarded as our attorney and he shall be free to report directly to us or through you, as our agent, as he desires. The attorney shall remit any money recovered less his legal fees and disbursements to **Diversified Credit Systems** and we shall forward to you said sum less our agreed commission and disbursements.

Dated this 8th day of July, 2021

Creditor: A.P.F.A.



Creditor Representative

"EXHIBIT A"

Page 1 of 1 of Supplemental Response

Ross v. Association of Professional Flight
Attendants, et. al; 4:22-cv-00343-Y

DEFENDANT, DIVERSIFIED'S EXHIBITS
(DOCUMENTS) IN RESPONSE TO PLAINTIFF'S
REQUEST FOR PRODUCTION

EXHIBIT 1
PRIVILEGE LOG
(2 pages)

Ross v APFA

Privilege Log of Diversified Credit Systems

Date	From	To	Concerning	Privilege
11/1/2021	Thomas Reber	Erik Harris, cc'd Margot Nikitas	Advice, counsel, and related communications re: legal matters	Attorney Client Privilege
11/2/2021	Margot Nikitas	Thomas Reber, Erik Harris	Advice, counsel, and related communications re: legal matters	Attorney Client Privilege
11/2/2021	Thomas Reber	Margot Nikitas	Advice, counsel, and related communications re: legal matters	Attorney Client Privilege
11/16/2021	Thomas Reber	Erik Harris, cc'd Margot Nikitas	Advice, counsel, and related communications re: legal matters	Attorney Client Privilege
12/8/2021	Margot Nikitas	Thomas Reber, Erik Harris	Advice, counsel, and related communications re: legal matters	Attorney Client Privilege
12/8/2021	Thomas Reber	Margot Nikitas	Advice, counsel, and related communications re: legal matters	Attorney Client Privilege
1/7/2022	Thomas Reber	Erik Harris, cc'd Margot Nikitas	Advice, counsel, and related communications re: legal matters	Attorney Client Privilege
1/21/2022	Thomas Reber	Erik Harris, cc'd Margot Nikitas	Advice, counsel, and related communications re: legal matters	Attorney Client Privilege
1/21/2022	Margot Nikitas	Thomas Reber, Erik Harris	Advice, counsel, and related communications re: legal matters	Attorney Client Privilege
3/22/2022	Margot Nikitas	Michael Rake	Advice, counsel, and related communications re: legal matters	Attorney Client Privilege

3/25/2022	Michael Rake	Margot Nikitas, cc'd Thomas Reber and M. McGaughey	Advice, counsel, and related communications re: legal matters	Attorney Client Privilege
3/25/2022	Margot Nikitas	Michael Rake, cc'd Thomas Reber and M. McGaughey	Advice, counsel, and related communications re: legal matters	Attorney Client Privilege
3/30/2022	Michael Rake	Margot Nikitas, cc'd Thomas Reber and M. McGaughey	Advice, counsel, and related communications re: legal matters	Attorney Client Privilege
3/30/2022	Margot Nikitas	Michael Rake, cc'd Thomas Reber and M. McGaughey	Advice, counsel, and related communications re: legal matters	Attorney Client Privilege

Ross v. Association of Professional Flight
Attendants, et. al; 4:22-cv-00343-Y

DEFENDANT, DIVERSIFIED'S EXHIBITS
(DOCUMENTS) IN RESPONSE TO PLAINTIFF'S
REQUEST FOR PRODUCTION

EXHIBIT 2
E-MAILS AND REGISTER OF ACTIONS
JP COURT-TARRANT COUNTY JP-3
BOB ROSS MATTER
(27 pages)

by mail but you can also scan and email all information on the account to us as well so we can get right on it. The more information you can provide, the better our chances. If the account is emailed, it can be sent directly to me or to Amie Easley at aeasley@dcscollect.com.

Please feel free to call me at (800) 256-3838.

Thanks,

Tom



From: Erik Harris <eharris@apfa.org>
Sent: Friday, January 15, 2021 9:46 AM
To: diversifiedcredit@sbcglobal.net
Subject: New Account Placement

Hi Tom-

I would like to discuss an account we have been unsuccessful at collecting. The balance is about \$5,400 and I've sent out a 30 day notice on November 26, a 15 day notice on December 15 and yesterday we gave another notice for 7 more days to call or make payment arrangements. I don't believe we will be able to collect.

Please let me know what you need from me to get this account sent over to you.

Thanks,

Erik

--
Erik Harris Pronouns: he, him, his
National Treasurer
Association of Professional Flight Attendants
Office 817.540.0108x 8231 | Email eharris@apfa.org
The content of this email is intended solely for the recipient(s). It is not to be shared, forwarded or posted without the author's written consent.



Virus-free. www.avast.com

Erik Harris *Pronouns: he, him, his*

National Treasurer

Association of Professional Flight Attendants

Office 817.540.0108x 8231 | Email eharris@apfa.org

The content of this email is intended solely for the recipient(s).

It is not to be shared, forwarded or posted without the author's written consent.



From: Erik Harris <eharris@apfa.org>
Date: Saturday, January 16, 2021 at 7:04 PM
To: Tom Reber <diversifiedcredit@sbcglobal.net>
Subject: Re: New Account Placement

Hey Tom-

Thanks for getting back so quickly. My apologies about not taking your call, we are remote and all of my calls route to my assistant. I will email all of the details to you and Amie and we connect sometime next week.

We have spoken to the debtor and he agreed to make \$100 payments for the next 3 years, however, our board of directors prefer that an outside agency do the collections. This will avoid any additional harassment from the debtor.

Just a heads up, he is pretty aggressive in his tone and he tends to fabricate. I'm sure you will hear many variants of the story.

I look forward to connecting with you.

Thanks,

Erik

Erik Harris *Pronouns: he, him, his*

National Treasurer

Association of Professional Flight Attendants

Office 817.540.0108x 8231 | Email eharris@apfa.org

The content of this email is intended solely for the recipient(s).

It is not to be shared, forwarded or posted without the author's written consent.



From: Tom Reber <diversifiedcredit@sbcglobal.net>
Date: Friday, January 15, 2021 at 10:17 AM
To: Erik Harris <eharris@apfa.org>
Subject: RE: New Account Placement

Hi Erik,

I tried to reach you by phone but was having some difficulty getting through. I'd be happy to talk to you about this account if you'd like to speak in person. As far as listing the account, I believe they normally send accounts to be placed

Association of Professional Flight Attendants
Office 817.540.0108x 8231 | Email eharris@apfa.org
The content of this email is intended solely for the recipient(s).
It is not to be shared, forwarded or posted without the author's written consent.



From: Tom Reber <diversifiedcredit@sbcglobal.net>

Date: Thursday, January 28, 2021 at 3:42 PM

To: Erik Harris <eharris@apfa.org>

Cc: Amie Easley <aesley@dcscollect.com>

Subject: RE: New Account Placement

Hi Erik,

We start collecting immediately once the account is placed in our system. It should go in by tomorrow so we will begin collecting on the account on Monday once it has processed.

Thanks,

Tom

Thomas L. Reber
VP of Operations

DIVERSIFIED CREDIT SYSTEMS
PO Box 3424
Longview, TX 75606
(800) 256-3838 National
(903) 753-1215 Fax
www.dcscollect.com

From: Erik Harris <eharris@apfa.org>
Sent: Thursday, January 28, 2021 3:26 PM
To: Tom Reber <diversifiedcredit@sbcglobal.net>
Cc: aesley@dcscollect.com
Subject: Re: New Account Placement
Importance: High

Hi Tom & Amie-

Attached are the documents that were sent. His SSN is [REDACTED] and his DOB is [REDACTED].
Other addresses that we've known him to be located is [REDACTED]

When do you usually begin collecting?

Thanks,

Erik

A
aff

From: Tom Reber <diversifiedcredit@sbcglobal.net>
Date: Saturday, February 27, 2021 at 9:09 AM
To: Erik Harris <eharris@apfa.org>
Subject: RE: New Account Placement

Hi Erik,

So far we do not have any payments on Mr. Ross' account. We are actively working it though.

I have sent a full status report on all accounts to David Rey and have attached a copy to this email. We also mailed out an invoice to A.P.F.A. at the end of the week.

Thanks,

Tom



From: Erik Harris <eharris@apfa.org>
Sent: Friday, February 26, 2021 11:13 PM
To: Tom Reber <diversifiedcredit@sbcglobal.net>
Cc: Amie Easley <aeasley@dcscollect.com>
Subject: Re: New Account Placement

Hey Tom,

I hope you and your family are recovering from the ice storms from the last weeks. We have a Board of Director's meeting coming up next week and I will need to update them on the status of the payments for Mr. Ross.

Do you have any updates?

Thanks,

Erik

--
Erik Harris *Pronouns: he, him, his*
National Treasurer

diversifiedcredit@sbcglobal.net

From: Tom Reber <diversifiedcredit@sbcglobal.net>
Sent: Monday, March 1, 2021 11:32 AM
To: 'Erik Harris'
Subject: RE: New Account Placement

Hi Erik,

I'll be sure to copy you on the status report each month. If you have any questions on statuses you're not sure of, I'll be more than happy to explain what they mean. Let me know which ones you need clarification on.

Hope you had a great weekend.

Tom



From: Erik Harris <eharris@apfa.org>
Sent: Saturday, February 27, 2021 1:40 PM
To: Tom Reber <diversifiedcredit@sbcglobal.net>
Subject: Re: New Account Placement

Hey Tom-

This is awesome! Would you mind copying me in on these status updates going forward? Also, do you have a list of what all the status codes mean in the process? I can see in the status description but I don't know exactly what each one mean. Some are very clear and self explanatory but some I'm not sure.

Thanks,

Erik

--
Erik Harris *Pronouns: he, him, his*
National Treasurer
Association of Professional Flight Attendants
Office 817.540.0108x 8231 | Email eharris@apfa.org
The content of this email is intended solely for the recipient(s).
It is not to be shared, forwarded or posted without the author's written consent.



From: Bob 2 <bobrossapfa@gmail.com>
Date: Tuesday, March 9, 2021 at 8:13 AM
To: Tim Schwartz <tschwartz@apfa.org>, Amber De Roxtra <aderoxtra@apfa.org>, Randy Trautman <rtrautman@apfa.org>, John Nikides <jnikides@apfa.org>, Mischel Babi <mbabi@apfa.org>, John Pennel <jpennel@apfa.org>, Scott Hazlewood <shazlewood@apfa.org>, Robert Norvell <rnorvell@apfa.org>, Kim Kaswinkel <kkaswinkel@apfa.org>, Amy Milenovic <amilenovic@apfa.org>, Susan Wroble <swroble@apfa.org>
Cc: National President <president@apfa.org>, National Treasurer <treasurer@apfa.org>, Larry Salas <lsalas@apfa.org>, National Secretary <secretary@apfa.org>, Margot Nikitas <MNikitas@apfa.org>
Subject: Letter the Board

Base Presidents,

In response to yesterdays Treasurers Report, I have on several occasions, attempted to contact the Collection agency with the information given to me by Erik Harris, Diversified Credit Systems. After several attempts to contact this agency, I was told they do not have any account in my name or from APFA in my name

I am requesting that my account be withdrawn from any collections agency and any negative reporting to credit agencies be reversed as evidence of good will until all facts and/or an affordable payment plan can be established. I would like access to records to confirm I was paid per our resignation agreement, any balance be agreed to by both parties and a proper and affordable payment plan be established to make APFA whole. I believe this is not asking too much but is all I've been asking for since this all started.

It is import for the BOD to know I had nothing to do with the method or calculations used in my unused sick and vacation days and would have preferred this issue have been addressed when the other Officers were notified. I was told by Craig Gunter, the former APFA National Treasurer and the former APFA attorney Mark Richard, well over a year ago, that my calculations were correct.

At no time have I ever stated that I "refuse" to pay or reimburse APFA, as has been stated. I did not address this on the record yesterday as that would violate my privacy and my family personal interests. I am asking the BOD to work with me on this issue as there is only now policy and was no such policy for sending incidents like this to collections with only 30 day notice without hearing the member's disputes and without full knowledge of facts in the case.

I would also like to applaud and support Erik Harris' effort to rectify APFA's financial situation, considering the state of financial devastation he walked into. I am asking the BOD's support in rectifying any misunderstandings and allow us to work out an equitable payment plan based on all known facts and calculations. I would also like to set up a meeting with Erik Harris and APFA Legal Counsel, Margot Nikitas to review the calculations on my monies owed.

In Unity,

Bob Ross

Bob Ross
SFO Base President-Elect

Association of Professional Flight Attendants (APFA)
Representing the Flight Attendants of American Airlines

This e-mail, including attachments, is intended for the exclusive use of the addressee. If you are not the intended recipient, any dissemination, use, distribution or copying is prohibited.



Virus-free. www.avast.com

To: Erik Harris <eharris@apfa.org>
Subject: RE: Letter the Board

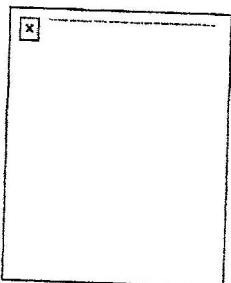
Hi Erik,

We do have Mr. Ross in our system and our notes do not reflect that he has contacted our office. Our phones are answered by a live person Monday-Thursday from 8:30 a.m. to 8:00 p.m. and Friday from 8:30 a.m. to 5:00 p.m. Voicemails that are left after hours are checked daily and distributed to collectors for callbacks. We do not have a phone number for Mr. Ross but have sent him letters.

He can reach us at (800) 256-3838.

Thanks,

Tom



From: Erik Harris <eharris@apfa.org>
Sent: Tuesday, March 9, 2021 8:50 AM
To: Tom Reber <diversifiedcredit@sbcglobal.net>
Subject: FW: Letter the Board

Hi Tom,

I received the following message from Bob Ross regarding his account. Do you have any record of him contacting your office? He claims he has made several attempts to reach you and is now disputing the debts on that basis. Additionally, he claims that it has already hit his credit report which can't be true because you told me it doesn't hit his credit until after 60 days.

I need to brief the Board of Directors so they know how best to respond to this email.

Thanks,

Erik

--
Erik Harris Pronouns: he, him, his

National Treasurer
Association of Professional Flight Attendants
Office 817.540.0108x 8232 | Email treasurer@apfa.org
The content of this email is intended solely for the recipient(s).
It is not to be shared, forwarded or posted without the author's written consent.

Office 817.540.0108x 8231 | Email eharris@apfa.org

The content of this email is intended solely for the recipient(s).

It is not to be shared, forwarded or posted without the author's written consent.

APFA

From: Tom Reber <diversifiedcredit@sbcglobal.net>

Date: Tuesday, March 9, 2021 at 2:05 PM

To: Erik Harris <eharris@apfa.org>

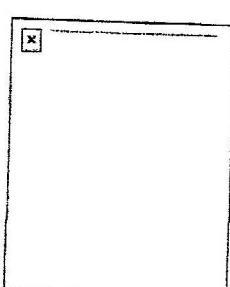
Subject: RE: Letter the Board

Thanks Erik,

We've updated his file with the phone numbers and forwarded it to a collector to call him.

Thanks,

Tom



From: Erik Harris <eharris@apfa.org>

Sent: Tuesday, March 9, 2021 1:30 PM

To: Tom Reber <diversifiedcredit@sbcglobal.net>

Subject: Re: Letter the Board

Thanks for the update Tom. The phone numbers I have for Bob [REDACTED]

Much appreciated!

Erik Harris *Pronouns: he, him, his*

National Treasurer

Association of Professional Flight Attendants

Office 817.540.0108x 8231 | Email eharris@apfa.org

The content of this email is intended solely for the recipient(s).

It is not to be shared, forwarded or posted without the author's written consent.

APFA

From: Tom Reber <diversifiedcredit@sbcglobal.net>

Date: Tuesday, March 9, 2021 at 9:26 AM

From: Bob 2 <bobrossapfa@gmail.com>
Date: Tuesday, March 9, 2021 at 8:13 AM
To: Tim Schwartz <tschwartz@apfa.org>, Amber De Roxtra <aderoxtra@apfa.org>, Randy Trautman <rtrautman@apfa.org>, John Nikides <jnikides@apfa.org>, Mischel Babi <mbabi@apfa.org>, John Pennel <jpennel@apfa.org>, Scott Hazlewood <shazlewood@apfa.org>, Robert Norvell <rnorvell@apfa.org>, Kim Kaswinkel <kkaswinkel@apfa.org>, Amy Milenovic <amilenovic@apfa.org>, Susan Wroble <swoible@apfa.org>
Cc: National President <president@apfa.org>, National Treasurer <treasurer@apfa.org>, Larry Salas <lsalas@apfa.org>, National Secretary <secretary@apfa.org>, Margot Nikitas <MNIkitas@apfa.org>
Subject: Letter the Board

Base Presidents,

In response to yesterdays Treasurers Report, I have on several occasions, attempted to contact the Collection agency with the information given to me by Erik Harris, Diversified Credit Systems. After several attempts to contact this agency, I was told they do not have any account in my name or from APFA in my name

I am requesting that my account be withdrawn from any collections agency and any negative reporting to credit agencies be reversed as evidence of good will until all facts and/or an affordable payment plan can be established. I would like access to records to confirm I was paid per our resignation agreement, any balance be agreed to by both parties and a proper and affordable payment plan be established to make APFA whole. I believe this is not asking too much but is all I've been asking for since this all started.

It is import for the BOD to know I had nothing to do with the method or calculations used in my unused sick and vacation days and would have preferred this issue have been addressed when the other Officers were notified. I was told by Craig Gunter, the former APFA National Treasurer and the former APFA attorney Mark Richard, well over a year ago, that my calculations were correct.

At no time have I ever stated that I "refuse" to pay or reimburse APFA, as has been stated. I did not address this on the record yesterday as that would violate my privacy and my family personal interests. I am asking the BOD to work with me on this issue as there is only now policy and was no such policy for sending incidents like this to collections with only 30 day notice without hearing the member's disputes and without full knowledge of facts in the case.

I would also like to applaud and support Erik Harris' effort to rectify APFA's financial situation, considering the state of financial devastation he walked into. I am asking the BOD's support in rectifying any misunderstandings and allow us to work out an equitable payment plan based on all known facts and calculations. I would also like to set up a meeting with Erik Harris and APFA Legal Counsel, Margot Nikitas to review the calculations on my monies owed.

In Unity,

Bob Ross

Bob Ross
SFO Base President-Elect

Association of Professional Flight Attendants (APFA)
Representing the Flight Attendants of American Airlines

This e-mail, including attachments, is intended for the exclusive use of the addressee. If you are not the intended recipient, any dissemination, use, distribution or copying is prohibited.



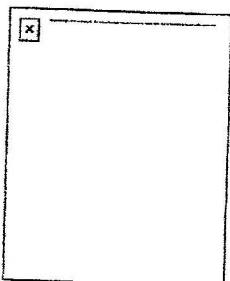
Virus-free. www.avast.com

We do have Mr. Ross in our system and our notes do not reflect that he has contacted our office. Our phones are answered by a live person Monday-Thursday from 8:30 a.m. to 8:00 p.m. and Friday from 8:30 a.m. to 5:00 p.m. Voicemails that are left after hours are checked daily and distributed to collectors for callbacks. We do not have a phone number for Mr. Ross but have sent him letters.

He can reach us at (800) 256-3838.

Thanks,

Tom



From: Erik Harris <eharris@apfa.org>
Sent: Tuesday, March 9, 2021 8:50 AM
To: Tom Reber <diversifiedcredit@sbcglobal.net>
Subject: FW: Letter the Board

Hi Tom,

I received the following message from Bob Ross regarding his account. Do you have any record of him contacting your office? He claims he has made several attempts to reach you and is now disputing the debts on that basis. Additionally, he claims that it has already hit his credit report which can't be true because you told me it doesn't hit his credit until after 60 days.

I need to brief the Board of Directors so they know how best to respond to this email.

Thanks,

Erik

--
Erik Harris *Pronouns: he, him, his*

National Treasurer

Association of Professional Flight Attendants

Office 817.540.0108x 8232 | Email treasurer@apfa.org

The content of this email is intended solely for the recipient(s).

It is not to be shared, forwarded or posted without the author's written consent.





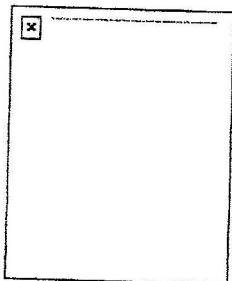
From: Tom Reber <diversifiedcredit@sbcglobal.net>
Date: Tuesday, March 9, 2021 at 2:05 PM
To: Erik Harris <eharris@apfa.org>
Subject: RE: Letter the Board

Thanks Erik,

We've updated his file with the phone numbers and forwarded it to a collector to call him.

Thanks,

Tom



From: Erik Harris <eharris@apfa.org>
Sent: Tuesday, March 9, 2021 1:30 PM
To: Tom Reber <diversifiedcredit@sbcglobal.net>
Subject: Re: Letter the Board

Thanks for the update Tom. The phone numbers I have for Bob in [redacted]

Much appreciated!

Erik Harris *Pronouns: he, him, his*

National Treasurer

Association of Professional Flight Attendants

Office 817.540.0108x 8231 | Email eharris@apfa.org

The content of this email is intended solely for the recipient(s). It is not to be shared, forwarded or posted without the author's written consent.



From: Tom Reber <diversifiedcredit@sbcglobal.net>
Date: Tuesday, March 9, 2021 at 9:26 AM
To: Erik Harris <eharris@apfa.org>
Subject: RE: Letter the Board

National Treasurer
Association of Professional Flight Attendants
Office 817.540.0108x 8231 | Email eharris@apfa.org
*The content of this email is intended solely for the recipient(s).
It is not to be shared, forwarded or posted without the author's written consent.*



From: Tom Reber <diversifiedcredit@sbcglobal.net>
Date: Friday, April 2, 2021 at 9:36 AM
To: Erik Harris <eharris@apfa.org>
Subject: RE: Letter the Board

Hi Erik,

The last communication with Mr. Ross is that he disputed the account. We sent him itemization and a dispute completion form as we are required to by law. We have not been able to speak to him since.

Thanks,

Tom

Thomas L. Reber
VP of Operations

DIVERSIFIED CREDIT SYSTEMS
PO Box 3424
Longview, TX 75606
(800) 256-3838 National
(903) 753-1215 Fax
www.dcscollect.com

From: Erik Harris <eharris@apfa.org>
Sent: Thursday, April 1, 2021 2:58 PM
To: Tom Reber <diversifiedcredit@sbcglobal.net>
Subject: Re: Letter the Board

Hi Tom,

Our board of directors have asked for an update on Bob Ross' payment on his account.

Would you mind providing that when you have a moment?

Thanks,

Erik

--
Erik Harris *Pronouns: he, him, his*
National Treasurer
Association of Professional Flight Attendants

diversifiedcredit@sbcglobal.net

From: Tom Reber <diversifiedcredit@sbcglobal.net>
Sent: Wednesday, April 14, 2021 11:55 AM
To: 'Erik Harris'
Subject: RE: Letter the Board

Hi Erik,

Our supervisor talked to Mr. Ross. He is stating he's on the board of A.P.F.A.? Also, he said that he did not receive our letter with the dispute verification. He now lives in California. When we talked to him previously he verified his address. Our supervisor updated his address information and we are re-sending the information . He stated that he is trying to refinance his home. It sounds like he may pay the account but it seems he may be stalling as well.

We will keep on top of the account.

Thanks,

Tom

Thomas L. Reber
VP of Operations



DIVERSIFIED CREDIT SYSTEMS

PO Box 3424
Longview, TX 75606

(800) 256-3838 National
(903) 753-1215 Fax
www.dcscollect.com

From: Erik Harris <eharris@apfa.org>
Sent: Tuesday, April 13, 2021 4:00 PM
To: Tom Reber <diversifiedcredit@sbcglobal.net>
Subject: Re: Letter the Board

Hi Tom,

Any updates from Mr. Ross? Would you mind just sending me a note when he does correspond, that way I won't keep bugging you.

Thanks,

Erik

--
Erik Harris *Pronouns: he, him, his*

National Treasurer

Association of Professional Flight Attendants
Office 817.540.0108x 8231 | Email eharris@apfa.org

The content of this email is intended solely for the recipient(s).

It is not to be shared, forwarded or posted without the author's written consent.

APFA

From: Tom Reber <diversifiedcredit@sbcglobal.net>
Date: Wednesday, April 14, 2021 at 1:26 PM
To: Erik Harris <eharris@apfa.org>
Subject: RE: Letter the Board

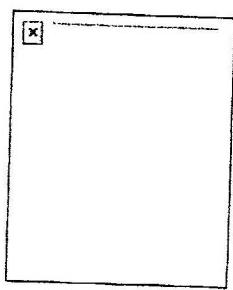
Hi Erik,

Mr. Ross just contacted our supervisor again and stated that you had forwarded him my email to you. That was a confidential business email and did not contain the mini Miranda and other federal guidelines that we are required to provide in any communications with a debtor. We are sending by certified mail verification of the debt again and will allow Mr. Ross a grace period to respond after which if he fails to satisfy this debt, we will recommend taking legal action against him in the California county he resides in.

If Mr. Ross contacts you for any reason, please refer him to our office. And again, as with the others, this is a confidential communication between us.

Thanks,

Tom



From: Erik Harris <eharris@apfa.org>
Sent: Tuesday, April 13, 2021 4:00 PM
To: Tom Reber <diversifiedcredit@sbcglobal.net>
Subject: Re: Letter the Board

Hi Tom,

Any updates from Mr. Ross? Would you mind just sending me a note when he does correspond, that way I won't keep bugging you.

Thanks,

Erik

--
Erik Harris *Pronouns: he, him, his*

diversifiedcredit@sbcglobal.net

From: Tom Reber <diversifiedcredit@sbcglobal.net>
Sent: Wednesday, April 14, 2021 1:42 PM
To: 'Erik Harris'
Subject: RE: Letter the Board

Hi Erik,

I totally understand. There wasn't anything in the email itself that I felt was derogatory, just an update to you. Doesn't necessarily start the clock over. We are re-sending the dispute information by certified mail so we will know when he receives it and then we will reach back out to him by phone a couple of days after allowing him a chance to review.

Thanks,

Tom

Thomas L. Reber
VP of Operations



DIVERSIFIED CREDIT SYSTEMS
PO Box 3424
Longview, TX 75606

(800) 256-3838 National
(903) 753-1215 Fax
www.dscollect.com

From: Erik Harris <eharris@apfa.org>
Sent: Wednesday, April 14, 2021 1:30 PM
To: Tom Reber <diversifiedcredit@sbcglobal.net>
Subject: Re: Letter the Board

Hey Tom,

My apologies. I forwarded the response to the BOD in which he was included on the communication. I didn't realize that was part of the communications.

I will refer him to you from now on. Hopefully this doesn't harm your company in any way. Does this mean the clock starts all over for him?

Thanks,

Erik

--
Erik Harris *Pronouns: he, him, his*
National Treasurer
Association of Professional Flight Attendants
Office 817.540.0108x 8231 | Email eharris@apfa.org
The content of this email is intended solely for the recipient(s).

diversifiedcredit@sbcglobal.net

From: diversifiedcredit@sbcglobal.net
Sent: Tuesday, August 24, 2021 6:12 PM
To: 'Erik Harris'
Cc: 'Margot Nikitas'
Subject: RE: Missed Call

Hi Erik,

Tomorrow at 12:30 works well for me.

Thanks,

Tom

From: Erik Harris <eharris@apfa.org>
Sent: Tuesday, August 24, 2021 6:10 PM
To: diversifiedcredit@sbcglobal.net
Cc: Margot Nikitas <MNikitas@apfa.org>
Subject: Re: Missed Call

Hey Tom,

No worries at all. Margot our attorney and I were calling you to touch base about the Bob Ross issue we were talking about on Monday.

Are you available at 12:30 tomorrow for us to chat?

Thanks,

Erik

--
Erik Harris *Pronouns: he, him, his*

National Treasurer

Association of Professional Flight Attendants

Office 817.540.0108x 8231 | Email eharris@apfa.org

The content of this email is intended solely for the recipient(s).

It is not to be shared, forwarded or posted without the author's written consent.



From: diversifiedcredit@sbcglobal.net <diversifiedcredit@sbcglobal.net>

Date: Monday, August 23, 2021 at 5:06 PM

To: Erik Harris <eharris@apfa.org>

Subject: Missed Call

Hi Erik,

Amie didn't realize I was out when she transferred you to my office. I'll be here until 8:00 p.m. tonight and back in at 8:30 a.m.

Thanks,

Tom



 Virus-free. www.avast.com

diversifiedcredit@sbcglobal.net

From: diversifiedcredit@sbcglobal.net
Sent: Tuesday, August 31, 2021 3:27 PM
To: 'Erik Harris'
Subject: Update

Hi Erik,

I just wanted to let you know that I'm still working on this and getting information along with trying to find an attorney to handle this in CA. After talking to the courthouse again, they told me I was given wrong information the first time I talked to someone there. Court hearings are not done by zoom. There is another level of civil litigation that we can pursue and that's what I'm working on now.

Thanks,

Tom

Thomas L. Reber
VP of Operations



DIVERSIFIED CREDIT SYSTEMS
PO Box 3424
Longview, TX 75606
(800) 256-3838 National
(903) 753-1215 Fax
www.dcscollect.com



Virus-free. www.avast.com



From: Erik Harris <eharris@apfa.org>
Date: Tuesday, October 12, 2021 at 6:21 PM
To: Tom Reber <diversifiedcredit@sbcglobal.net>
Cc: Margot Nikitas <MNikitas@apfa.org>
Subject: Bob Ross Lawsuit

Hi Tom,

Margot and I have to brief to the Board of Directors next Tuesday at our meeting and wanted to get the status of the case.

Thanks,

Erik

--
Erik Harris *Pronouns: he, him, his*

National Treasurer

Association of Professional Flight Attendants

Office 817.540.0108x 8231 | Email eharris@apfa.org

The content of this email is intended solely for the recipient(s).

It is not to be shared, forwarded or posted without the author's written consent.



Virus-free. www.avast.com

diversifiedcredit@sbcglobal.net

From: diversifiedcredit@sbcglobal.net
Sent: Wednesday, October 27, 2021 1:35 PM
To: 'Erik Harris'
Subject: RE: Bob Ross Lawsuit

Hi Erik,

I sincerely apologize. I checked for your email from the 12th and it was in my spam folder for some reason. I called you back and left a message.

Due to Covid and California being so different in general, we have not been able to find an attorney that is willing to take the case. I've talked to a few and left messages for others that never called me back. We have still been trying to reach Mr. Ross about the debt. We did list it on his credit and that will affect his ability to purchase anything on credit for up to seven years and on a nationwide basis.

We are still pursuing this account by phone and will be persistent with Mr. Ross until we get positive activity from him toward resolving this account.

Please give me a call if you have any questions or would like to discuss further.

Thanks,

Tom

From: Erik Harris <eharris@apfa.org>
Sent: Tuesday, October 26, 2021 3:55 PM
To: Tom Reber <diversifiedcredit@sbcglobal.net>
Cc: Margot Nikitas <MNikitas@apfa.org>
Subject: Re: Bob Ross Lawsuit

Hey Tom,

Following up on my last message. Please let us know a status and when we can connect so we can update our Board.

Thanks,

Erik

--
Erik Harris *Pronouns: he, him, his*
National Treasurer
Association of Professional Flight Attendants
Office 817.540.0108x 8231 | Email eharris@apfa.org
The content of this email is intended solely for the recipient(s). It is not to be shared, forwarded or posted without the author's written consent.

diversifiedcredit@sbcglobal.net

From: diversifiedcredit@sbcglobal.net
Sent: Friday, October 29, 2021 9:34 AM
To: 'Erik Harris'
Cc: Margot Nikitas
Subject: Bob Ross

Hi Erik,

It looks like we will be able to sue Mr. Ross here in Texas. I have forwarded all of the information on to our attorney for review. I'll keep you and Margot up to date on the process. It should go much quicker from here.

Have a great weekend.

Tom

Thomas L. Reber
VP of Operations



DIVERSIFIED CREDIT SYSTEMS
PO Box 3424
Longview, TX 75606
(800) 256-3838 National
(903) 753-1215 Fax
www.dcscollect.com



Virus-free, www.avast.com

Thanks,
Margot

Margot A. Nikitas
General Counsel
Association of Professional Flight Attendants
1004 W. Euless Boulevard
Euless, TX 76040
817.540.0108 ext. 8108 (phone)
817.355.1919 (fax)
www.apfa.org

Confidentiality Notice: The content of this email message is intended for the confidential use of the intended recipient only. The information may be privileged, confidential and protected from disclosure. Recipients should not file copies of this email with publicly accessible records. If you are not the intended recipient, you have received this email in error, and any further review, dissemination, distribution, copying or forwarding of this email is strictly prohibited. If you received this email in error, please notify me immediately at 817.540.0108 ext. 8108 or by return email and then delete this email in its entirety. Thank you.

From: diversifiedcredit@sbcglobal.net <diversifiedcredit@sbcglobal.net>
Sent: Friday, January 7, 2022 4:48:14 PM
To: Erik Harris <eharris@apfa.org>
Cc: Margot Nikitas <MNikitas@apfa.org>
Subject: Bob Ross

Our attorney is getting ready to file on Monday however he did have a question. He's saying in your agreement with Bob Ross there's an arbitration clause. He said he's more than happy to proceed but I wanted to get clarification on that

Thanks,

Tom



... Virus-free. www.avast.com

diversifiedcredit@sbcglobal.net

From: Margot Nikitas <MNikitas@apfa.org>
Sent: Tuesday, January 11, 2022 3:23 PM
To: diversifiedcredit@sbcglobal.net
Subject: RE: Bob Ross

Great, thanks Tom!

Margot A. Nikitas
General Counsel
Association of Professional Flight Attendants
1004 W. Euless Boulevard
Euless, TX 76040
817.540.0108 ext. 8108 (phone)
817.355.1919 (fax)
www.apfa.org

Confidentiality Notice: The content of this email message is intended for the confidential use of the intended recipient only. The information may be privileged, confidential and protected from disclosure. Recipients should not file copies of this email with publicly accessible records. If you are not the intended recipient, you have received this email in error, and any further review, dissemination, distribution, copying or forwarding of this email is strictly prohibited. If you received this email in error, please notify me immediately at 817.540.0108 ext. 8108 or by return email and then delete this email in its entirety. Thank you.

From: diversifiedcredit@sbcglobal.net <diversifiedcredit@sbcglobal.net>
Sent: Tuesday, January 11, 2022 3:22 PM
To: Margot Nikitas <MNikitas@apfa.org>
Subject: RE: Bob Ross

Great, thanks. I'll forward your contact information and have him give you a call tomorrow afternoon.
Thanks,

Tom

From: Margot Nikitas <MNikitas@apfa.org>
Sent: Tuesday, January 11, 2022 3:20 PM
To: diversifiedcredit@sbcglobal.net
Subject: RE: Bob Ross

Hi Tom,

I will be in meetings the rest of today and again tomorrow until early afternoon. I'll be available after 2pm tomorrow at [REDACTED]

Thanks,
Margot

Margot A. Nikitas
General Counsel

Association of Professional Flight Attendants
1004 W. Euless Boulevard
Euless, TX 76040
817.540.0108 ext. 8108 (phone)
817.355.1919 (fax)
www.apfa.org

Confidentiality Notice: The content of this email message is intended for the confidential use of the intended recipient only. The information may be privileged, confidential and protected from disclosure. Recipients should not file copies of this email with publicly accessible records. If you are not the intended recipient, you have received this email in error, and any further review, dissemination, distribution, copying or forwarding of this email is strictly prohibited. If you received this email in error, please notify me immediately at 817.540.0108 ext. 8108 or by return email and then delete this email in its entirety. Thank you.

From: diversifiedcredit@sbcglobal.net <diversifiedcredit@sbcglobal.net>
Sent: Tuesday, January 11, 2022 3:10 PM
To: Margot Nikitas <MNikitas@apfa.org>
Subject: RE: Bob Ross

Hi Margot,

I will have our attorney give you a call. What is the best number to reach you at?

Thanks,

Tom



From: Margot Nikitas <MNikitas@apfa.org>
Sent: Friday, January 7, 2022 6:46 PM
To: diversifiedcredit@sbcglobal.net; Erik Harris <eharris@apfa.org>
Subject: Re: Bob Ross

Hi Tom,

Would it be possible for me to speak with your attorney directly? I also had a couple of questions for him regarding the lawsuit. Or we could set up a group conference call if that is preferable.

diversifiedcredit@sbcglobal.net

From: diversifiedcredit@sbcglobal.net
Sent: Tuesday, January 11, 2022 3:10 PM
To: 'Margot Nikitas'
Subject: RE: Bob Ross

Hi Margot,

I will have our attorney give you a call. What is the best number to reach you at?
Thanks,

Tom



From: Margot Nikitas <MNikitas@apfa.org>
Sent: Friday, January 7, 2022 6:46 PM
To: diversifiedcredit@sbcglobal.net; Erik Harris <eharris@apfa.org>
Subject: Re: Bob Ross

Hi Tom,

Would it be possible for me to speak with your attorney directly? I also had a couple of questions for him regarding the lawsuit. Or we could set up a group conference call if that is preferable.

Thanks,
Margot

Margot A. Nikitas
General Counsel
Association of Professional Flight Attendants
1004 W. Euless Boulevard
Euless, TX 76040
817.540.0108 ext. 8108 (phone)

REGISTER OF ACTIONS
CASE NO. JP03-22-DC00017757

Diversified Credit Systems vs. Robert (Bob) Ross

 Case Type: EFile Debt Claims
 Date Filed: 01/14/2022
 Location: JP No. 3
PARTY INFORMATION

Defendant	Ross, Robert (Bob) 4701 Hayloft Court El Dorado, CA 95762	Lead Attorneys Kerri Donnelly Phillips Retained 972-327-5800(W)
Plaintiff	Diversified Credit Systems P.O. Box 3424 Longview, TX 75606	Michael R. Rake Retained 940-498-2103(W)

EVENTS & ORDERS OF THE COURT

DISPOSITIONS	
05/25/2022	Dismissed by Plaintiff or Nonsuited (Judicial Officer: Brandt, William P. "Bill")
OTHER EVENTS AND HEARINGS	
01/14/2022	Original Petition Filed (OCA Opening) MISC ATTY
01/14/2022	Efile Original Petition Document Petition
01/14/2022	Citation Issued EMAILED TO PLTFS ATTY FOR SERVICE. HM
01/14/2022	CITATION
01/21/2022	Ross, Robert (Bob) Unserved Plaintiff's Attorney Contacted Court
	BY PHONE STATING HE WANTED THE DEFN SERVED BY CERTIFIED MAIL, BUT INSTEAD WE SENT HIM THE CITATION. ADVISED WE DID NOT RECEIVE ANY SERVICE FEES. HE STATED HE WILL SEND THE \$11.00 TODAY THROUGH EFILE/CL
01/21/2022	Alias Citation Requested BY PLTFS ATTY VIA EFILE. CITN TO BE SERVED BY CERTIFIED MAIL. \$11.00 PAID/CL
01/28/2022	CITATION
01/28/2022	Ross, Robert (Bob) Unserved Alias Citation Issued
02/25/2022	TO BE SERVED BY CERTIFIED MAIL/CL CM # 7016271000054391455
02/28/2022	Answer Filed BY DEFN'S ATTY VIA EFILE. ARBITRATION REQUEST. CASE TO BE SET FOR HEARING/CL
02/28/2022	Notice of Hearing SET FOR 4/21/22 @ 11AM. COPIES SENT TO BOTH PARTIES. MM
03/29/2022	Request For Zoom Hearing Filed BY DEFN'S ATTY. CASE TO BE SET FOR ZOOM. HM
03/29/2022	Zoom Hearing Scheduled EMAIL INVITE SENT TO DEFN'S ATTY THIS DATE. HM
04/19/2022	Motion To Withdraw Filed MTN TO WITHDRAW MTN TO COMPEL ARBITRATION FILED BY DEFN'S ATTY. PRESENTED TO JUDGE. HM
04/19/2022	Certified Copy Requested "NO FEES FILED" REQUEST FOR COPY OF THE ORIGINAL PETITION FILED BY DEFN'S ATTY. HM
04/19/2022	Order Approving Motion to Withdraw Entered ARBITRATION HEARING CANCELLED. ORDER EMAILED TO ALL PARTIES. HM
04/19/2022	Comments EMAIL SENT TO DEFN'S ATTY ADVISING THAT THE CERTIFIED COPY FEES TOTAL \$13.00. COPY WILL NOT BE ISSUED UNTIL THE FEE IS PAID. HM
04/21/2022	CANCELED Hearing (11:00 AM) (Judicial Officer Brandt, William P. "Bill") Other ARBITRATION HEARING
04/21/2022	Notice of Pre-Trial Mediation Hearing EMAILED/MAILED TO ALL PARTIES. MEDIATION SET FOR 6/9/22 AT 8:30AM. HM
04/27/2022	Certified Copy Requested BY DEFN'S ATTY. REQUEST FOR CERTIFIED COPIES OF THE PETITION. EMAILED THIS DATE. HM
05/24/2022	Motion for Non-Suit Filed BY PLTFS ATTY VIA EFILE. CASE SET FOR MEDIATION ON 6/9/22. PRESENTED TO JUDGE. MM
05/24/2022	Order of Non-Suit Without Prejudice Entered SIGNED BY JUDGE. CASE REMOVED FROM 6/9/22 MEDIATION DOCKET. EMAILED COPY TO BOTH PARTIES. MM
06/09/2022	CANCELED Pre-Trial Mediation (8:30 AM) (Judicial Officer Brandt, William P. "Bill") Non-Suit/Dismissed

FINANCIAL INFORMATION
<https://odyssey.tarrantcounty.com/PublicAccess/CaseDetail.aspx?CaseID=5575053>

1/2

	Defendant Ross, Robert (Bob)	
	Total Financial Assessment	
	Total Payments and Credits	
	Balance Due as of 04/26/2023	
04/27/2022	Transaction Assessment	13.00
04/27/2022	Internet Payment	13.00
	Receipt # JP3-2022-01600	0.00
		Ross, Robert (Bob)
		13.00
		(13.00)
	Plaintiff Diversified Credit Systems	
	Total Financial Assessment	
	Total Payments and Credits	
	Balance Due as of 04/26/2023	
01/14/2022	Transaction Assessment	65.00
01/14/2022	Internet Payment	65.00
01/14/2022	State Credit	0.00
01/21/2022	Transaction Assessment	54.00
01/21/2022	Internet Payment	(33.00)
	Receipt # JP3-2022-00203	(21.00)
		Diversified Credit Systems
		11.00
		(11.00)
	Receipt # JP3-2022-00313	Diversified Credit Systems